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★ DEC 01 2014 ★

SA/SDD/RMT
F.#2012R01574

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

**SUPERSEDING
INDICTMENT**

- against -

Cr. No. 12-661 (S-2) (SLT)
(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii),
924(c)(1)(B)(ii), 2339B(a)(1),
2339B(d), 2339D(a), 2339D(b), 2 and
3551 et seq.)

ALI YASIN AHMED,
also known as "Ismail,"
MADHI HASHI,
also known as "Talha," and
MOHAMED YUSUF,
also known as "Abu Zaid,"
"Hudeyfa" and
"Mohammed Abdulkadir,"

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Provide Material Support
to a Foreign Terrorist Organization)

1. In or about and between April 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally conspire to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including

currency and personnel, including themselves, to a foreign terrorist organization, to wit:
al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d) and 3551 et seq.)

COUNT TWO
(Providing Material Support to a Foreign
Terrorist Organization)

2. In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally provide material support and resources, as defined in 18 U.S.C. Section 2339A(b), including currency and personnel, including themselves, to a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

COUNT THREE
(Attempted Provision of Material Support to a Foreign
Terrorist Organization)

3. In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as "Ismail," MADHI HASHI, also known as "Talha," and MOHAMED YUSUF, also known as "Abu Zaid," "Hudeyfa" and "Mohammed Abdulkadir," together with others, did knowingly and intentionally attempt to provide material

support and resources, as defined in 18 U.S.C. Section 2339A(b), including currency and personnel, including themselves, to a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

COUNT FOUR

(Receipt of Military-Type Training from a Foreign Terrorist Organization)

4. In or about and between January 2009 and December 2009, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as “Ismail,” and MOHAMED YUSUF, also known as “Abu Zaid,” “Hudeyfa” and “Mohammed Abdulkadir,” together with others, did knowingly and intentionally receive military-type training from and on behalf of a foreign terrorist organization, to wit: al-Shabaab.

(Title 18, United States Code, Sections 2339D(a), 2339D(b), 2 and 3551 et seq.)

COUNT FIVE

(Unlawful Use of Firearms)

5. In or about and between December 2008 and August 2012, both dates being approximate and inclusive, within the extraterritorial jurisdiction of the United States, the defendants ALI YASIN AHMED, also known as “Ismail,” MADHI HASHI, also known as “Talha,” and MOHAMED YUSUF, also known as “Abu Zaid,” “Hudeyfa” and “Mohammed Abdulkadir,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts One through Four, and did knowingly and intentionally possess such firearms in

furtherance of said crimes of violence, one or more of which firearms was brandished and discharged, and one or more of which firearms was a machinegun.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2 and 3551 et seq.)

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 

ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. 0.136

F. #2012R01574
FORM DBD-34
JUN. 85

No. 12-661 (S-2) (SLT)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

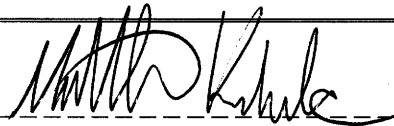
AHMED et al.

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(c)(1)(B)(ii), 2339B(a)(1),
2339B(d), 2339D(a), 2339D(b), 2 and 3551 et seq.))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Shreve Ariail, Seth D. DuCharme and Richard M. Tucker
Assistant U.S. Attorneys (718) 254-6616/6021/6204